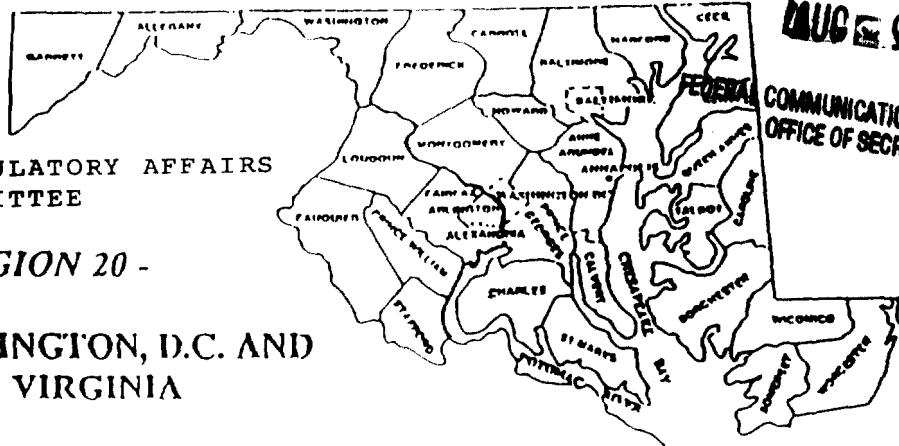


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FEDERAL COMMUNICATIONS COMMISSION
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LEGISLATIVE/REGULATORY AFFAIRS
COMMITTEE

- FOR REGION 20 -

MARYLAND, WASHINGTON, D.C. AND
NORTHERN VIRGINIA

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

In the Matter of)
)
Amendment of the Commission's)
Rules Concerning Low Power Radio)
and Automated Maritime Telecom-)
munications System Operations)
in the 216-217 MHz Band)

WT Docket No. 95-56

RM-7784

REPLY COMMENTS

Submitted by:

Region-20 Public Safety Plan Review Committee
Mr. Stephen H. Souder - Chairman
Region-20 RPRC Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 6K/4E
Alexandria, Virginia 22302

August 9, 1995

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PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC.

CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

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Submitted by: Region-20 Public Safety Review Committee
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Region-20 RPRC Legislative/Regulatory
Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 6K/4E
Alexandria, Virginia 22302

Date: August 9, 1995

I. INTRODUCTION

1. Before the Federal Communications Commission (Commission) is a Notice of Proposed Rule Making (Notice) to create a new Low Power Radio Service (LPRS) in the 216-217 MHz band.

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket 87-112 1/, the Region-20 Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20.

The obligations of that Committee included the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 2/ and establishment of a Region-20 Public Safety Review Committee (Committee or RPRC) to oversee its implementation.

3. This Notice, and the comments submitted, have raised important issues. Pursuant to 47 CFR 1.415, this Committee, representing the PSRS/governmental constituents for Region-20, hereby submits the following Reply Comments, addressing those issues of most concern and their potential effects on the constituency of Region-20.

II.

COMMENTS

4. In response to this Notice, comments have been submitted requesting that the Commission create a modified low power version of the formerly proposed **PERSONAL EMERGENCY LOCATOR TRANSMITTER SERVICE** (PELTS) as a sub-service of this newly proposed LPRS.3/ Adoption of a modified PELTS is in the interest of public-safety.

5. On April 19, 1990, this Committee submitted Reply Comments (PELTS Reply Comments) in response to a Notice of Proposed Rule Making, PR Docket 89-599/RM-6681 (FCC 89-342), concerning the creation of a PELTS. In those PELTS Reply Comments, this Committee, along with other major PELTS commenters, supported the creation of a PELTS.4/

6. On July 6, 1995, the RPRC convened its regular monthly meeting. At this meeting, this Committee unanimously reaffirmed its support for the creation of a PELTS.

7. This Committee hereby expresses its full support for the creation of a PELTS within the 216-217 MHz band and that the attached copy (Appendix A) of PELTS Reply Comments are to be considered as part of this Committee's total Reply Comment submission to this proceeding.

III.

CONCLUSION

8. For the reasons set forth above, the Region-20 RPRC respectfully requests that the Commission expand the scope of this newly proposed LPRS to include a PELTS. Commission adoption of a PELTS will assist public-safety/public-service entities in their ability to provide prompt Search and Rescue emergency services and is therefore in the **public interest**.

Respectfully submitted,



Mr. Stephen Souder - Chairman
Region-20 Public Safety Review Committee



Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 RPRC Legislative/
Regulatory Affairs Committee

IV.

FOOTNOTES

- 1/ REPORT AND ORDER, General Docket 87-112, FCC 87-359, Paragraph 4.
- 2/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, General Docket 90-7, DA 90-28, January 17, 1990.
- 3/ COMMENTS, Dr. Michael C. Trahos, WT Docket 95-56, July 18, 1995, at paragraph 11.
- 4/ REPLY COMMENTS, Technical Committee of the Region-20 Public Safety Planning Committee, PR Docket 89-599, April 19, 1990, in general and at Footnote 5.

[illegible]

APR 19 '90

OFFICE OF THE SECRETARY

**MARYLAND, WASHINGTON, D.C. AND
NORTHERN VIRGINIA**

In the Matter of)
)
Amendment of Parts 0, 1, and 95)
of the Commission's Rules)
regarding the establishment)
of a Personal Emergency Locator)
Transmitter Service)

RM-6681

Submitted by:

April 19, 1990

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 0, 1, and 95)	PR Docket No. 89-599
of the Commission's Rules)	
regarding the establishment of)	RM-6681
a Personal Emergency Locator)	
Transmitter Service)	

Reply Comments Filed in Response to a
Notice of Proposed Rule Making

Submitted by: Technical Committee -
Region 20 Public Safety Planning Committee
Mr. Walter P. Dixon - Technical Chairman
Department of General Services
Office of Telecommunications
State Office Building
301 West Preston Street, Room 1304
Baltimore, Maryland 21201

Date: April 19, 1990

I.

INTRODUCTION

1. Before the Federal Communications Commission (Commission) is a Notice of Proposed Rule Making (Notice) concerning the use of a portion the recently re-allocated 220-222 MHz band by the Personal Radio Services for the creation of a Personal Emergency Locator Transmitter Service (PELTS). Specifically, the Notice raises the questionable issue of restricting base station

eligibility to "governmental and private organizations who provide a search and rescue service and are recognized as providing such by a governmental entity."1/

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket 87-112 2/, the Region-20 Public Safety Planning Committee (Committee) was created to address the future communications needs and concerns of the PSRS users for Region-20. The obligations of this Committee include the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 3/ and its implementation.

3. This Notice has raised important issues. This Committee, representing the PSRS/governmental constituents for Region-20, hereby submits the following reply comments in response to this Notice, addressing those issues of most concern and their potential effects on the Region-20 public safety planning process.

II.

COMMENTS

4. This Committee supports the adoption of this Notice. However, as noted in paragraph 1 supra, this Committee is concerned regarding the specific Commission proposal of restricting PELTS base station eligibility to governmentally certified search and rescue organizations only. This Committee, representing the governmental agencies that would be doing the certification of

PELTS base station eligibility for Region-20, wants eligibility expanded further to include "...all established entities that provide distress/assistance communications to the public, with or without search and rescue capabilities."4/

5. This Committee concurs with those major commenters supporting the creation of a PELTS 5/ and supports those commenters expressing the desire for expanded base station eligibility. These commenters have correctly noted that non-search and rescue amateur radio and citizens radio organizations, such as the Radio Amateur Civil Emergency Service (RACES), the Amateur Radio Emergency Service (ARES) and the Radio Emergency Associated Communications Teams, Inc. (REACT) through local affiliated/chartered associations/teams, have proven to be a very valuable asset in providing the "'first line' distress/assistance communications"6/ between the public and PSRS/governmental members of this committee.

6. In local/regional emergencies, amateur radio and citizens radio organizations have provided valuable communications assistance to public safety entities. Commenters are correct in stating that not giving all established distress/assistance communications entities, with or without search and rescue capabilities, PELTS base station eligibility would be a "great waste of skilled man-power resources, particularly in isolated

areas were no governmental/private search and rescue organizations exist or will ever exist."7/

7. Members of this Committee have expressed concern regarding the financing of the equipment and personnel necessary to establishment and maintain PELTS base station(s) to cover their respective jurisdictions. With the severe monetary constraints that public safety entities must work by, the establishment of PELTS base station(s) systems will be most likely on the bottom of the priority list.

8. Giving all established distress/communications entities, with or without search and rescue capabilities, PELTS base station eligibility will allow for the establishment of the communications facilities necessary to create the wide-area coverage needed in PELTS for this service to come to fruition. Such expanded wide-area coverage will "promote the intended use of PELTS and serve the public interest, convenience and necessity."8/


9. This Committee is sensitive to the Commission's concern regarding restricting PELTS base station eligibility. PELTS base station eligibility should be restricted to established, governmentally certified, entities. However, restricting eligibility only to those entities proposed by the Commission is too narrow and not in the public interest.

III.

CONCLUSION

10. Therefore, the PSRS/governmental member entities and/or this Region-20 Committee are willing to endorse all distress/communications organizations, with or without search and rescue capabilities, that can show they are a public service communication organization within Region-20. It remains the opinion of this Committee that expanding PELTS base station eligibility for all such organizations is mandatory for this service to meet it's objectives and serve the public interest.

Respectfully submitted,



Walter P. Dixon - Chairman
Technical Committee -
Region-20 Public Safety Planning
Committee

MCT/mct

IV.

FOOTNOTES

- 1/ NOTICE OF PROPOSED RULE MAKING, PR Docket No. 89-599, FCC 89-342, December 12, 1989, Paragraph 18.
- 2/ REPORT AND ORDER, General Docket 87-112, FCC 87-359, Paragraph 4.
- 3/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, General Docket 90-7, DA 90-28, January 17, 1990.
- 4/ COMMENTS, Dr. Michael C. Trahos, PR Docket No. 89-599, January 22, 1989, Paragraph 16.
- 5/ COMMENTS, Interagency Committee on Search and Rescue of the United States Coast Guard, PR Docket No. 89-599, March 15, 1990;

COMMENTS, Electronic Tracking Systems, Inc., PR Docket No. 89-599, March 20, 1990;

COMMENTS, Radio Emergency Associated Communications Teams (REACT), Inc., PR Docket No. 89-599, March 20, 1990;

COMMENTS, Associated Public-Safety Communications Officers (APCO), Inc., PR Docket No. 89-599, March 20, 1990;

COMMENTS, SEA, Inc., PR Docket No. 89-599, March 20, 1990;

COMMENTS, Telonics, Inc., PR Docket No. 89-599, March 19, 1990;

COMMENTS, SARSAT Operations Division-National Oceanic and Atmospheric Administration (NOAA), PR Docket No. 89-599, March 21, 1990;

COMMENTS, National Aeronautics and Space Administration (NASA), PR Docket No. 89-599, March 20, 1990;

COMMENTS, Circuit Graphics, Inc., PR Docket No. 89-599, March 21, 1990.

- 6/ COMMENTS, Dr. Michael C. Trahos, PR Docket No. 89-599
Paragraph 14-15.
- 7/ Ibid., Paragraph 16.
- 8/ Ibid., Paragraph 17.